

THE HONORABLE MARSHA J. PECHMAN

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

HUONG HOANG, an individual

Plaintiff,

v.

AMAZON.COM, INC., a Delaware
corporation, and IMDB.COM, INC., a
Delaware corporation,

Defendants.

No. 2:11-CV-01709-JCC

**DECLARATION OF ASHLEY LOCKE
IN SUPPORT OF MOTION FOR
PROTECTIVE ORDER QUASHING
NOTICE OF DEPOSITION OF
KATHRYN SHEEHAN**

I, Ashley Locke, hereby declare as follows:

1. I am one of the attorneys representing defendants Amazon.com, Inc. and IMDb.com, Inc. ("Defendants") in the above-referenced matter. I make this declaration based on personal knowledge and review of records and correspondence relating to the above-referenced matter.

2. Attached as Exhibit A is a true and correct copy of document Bates IMDB000945-46, which is an email string dated November 12, 2008 between Kathryn Sheehan, Adrian Garver, and Giancarlo Cairella. This is the only email relevant to the above-captioned case on which Ms. Sheehan appears.

DECLARATION OF ASHLEY LOCKE IN
SUPPORT OF MOTION FOR PROTECTIVE
ORDER (NO. 2:11-CV-01709) – 1

24976-0480/LEGAL24291734.1

Perkins Coie LLP
1201 Third Avenue, Suite 4800
Seattle, WA 98101-3099
Phone: 206.359.8000
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1 3. Attached as Exhibit B is a true and correct copy of IMDb.com's privilege log in
2 the above-captioned case, which describes Exhibit A as: "Email string reflecting request for a
3 provision of legal advice regarding Plaintiff's birth date, between G. Cairella, (IMDb.com), A.
4 Garver (Amazon.com legal department), and K. Sheehan (Amazon.com in-house counsel)."
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7 4. Attached as Exhibit C are true and correct copies of deposition notices from
8 Plaintiff's counsel to Defendants' counsel and the cover email from Pollard to Roos dated July
9 20, 2012.
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11 5. Attached as Exhibit D is a true and correct copy of an email from Jackson to Roos
12 dated July 25, 2012.
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14 6. Attached as Exhibit E are true and correct copies of a letter from Roos to Jackson
15 dated July 30, 2012 and the cover email dated the same date.
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17 I declare under penalty of perjury under the laws of the United States that the foregoing is
18 true and correct.
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29 DATED: August 1, 2012

By: /s/ Ashley Locke
Ashley A. Locke

CERTIFICATE OF SERVICE

I certify that on August 1, 2012, I electronically filed the foregoing **DECLARATION OF ASHLEY LOCKE IN SUPPORT OF MOTION FOR PROTECTIVE ORDER QUASHING NOTICE OF DEPOSITION OF KATHRYN SHEEHAN** with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following attorneys of record

John W Dozier , Jr
Dozier Internet Law
301 Concourse Blvd
West Shore III , Ste 300
Glen Allen, VA 23059

☐ Via hand delivery
☐ Via U.S. Mail, 1st Class, Postage Prepaid
☐ Via Overnight Delivery
☐ Via Facsimile
☐ Via Email
☒ Via ECF

Randall Moeller
Derek Alan Newman
Newman & Newman
1201 Third Avenue, Ste 1600
Seattle, WA 98

☐ Via hand delivery
☐ Via U.S. Mail, 1st Class, Postage Prepaid
☐ Via Overnight Delivery
☐ Via Facsimile
☐ Via Email
☒ Via ECF

I certify under penalty of perjury that the foregoing is true and correct.

DATED this 1st day of August, 2012,

/s/ Ashley Locke

Ashley Locke, WSBA No. 40521

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Attorneys for Defendants Amazon.com, Inc.
and IMDb.com, Inc.

DECLARATION OF ASHLEY LOCKE IN
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